



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 19, 2022


VIA ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

REQUEST GRANTED.

The Court approves the modification to bail to
permit the defendant to travel as proposed.

10/19/2022 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: United States v. Hakim, 21 Cr. 259 (LJL)

Dear Judge Liman:

The defense writes with the consent of Pretrial and the Government to respectfully request the Court temporarily modify Mr. Hakim's bail conditions to allow him to travel to travel to the New York area from Sunday, October 23, 2022 to Tuesday, October 25, 2022. Mr. Hakim's proposed itinerary is as follows:

- 1) Sunday, October 23: fly in the morning from Detroit, MI to Newark, NJ. Mr. Hakim will stay at a verified address in Newark, NJ with his childhood friend who is currently employed by the United States Department of Defense. On Sunday, October 23, Mr. Hakim will attend a high school wrestling event at his high school alma mater. This trip is in part a networking trip because Mr. Hakim works as a high school referee in Detroit and is interested in expanding opportunities in that field.
- 2) Monday, October 24: Mr. Hakim will meet with counsel at the Federal Defenders of New York prior to his plea at 2 PM at 500 Pearl Street, New York, New York.
- 3) Tuesday, October 25: Mr. Hakim will return from Newark, NJ to Detroit, MI in the morning.

Mr. Hakim will follow all of Pretrial Services instructions and keep his tether in place on his ankle. If Pretrial wishes, he can visit the Southern District office on Monday either prior to after his plea. Mr. Hakim's pretrial officer in Michigan confirms that he is fully compliant with all the terms of his pretrial release. He

continues to be employed, but he is currently unable to work due to multiple medical issues.

Under separate cover, Mr. Hakim will send a request for the Court to order the United States Marshals service to pay for his flight from Detroit to Newark on Sunday, and a separate order for Pretrial Services to pay for his flight from Newark to Detroit on Tuesday, as the Marshals are no longer paying for roundtrip airfare for indigent defendants.

Respectfully submitted,



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